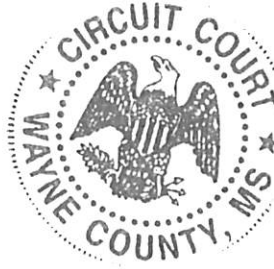


I CERTIFY THAT THIS IS A TRUE AND
CORRECT COPY OF THE ORIGINAL

ROSE M. BINGHAM, Circuit Clerk

By Kenneth Hone D.C.



FILE NO. CV-2020-114-C

C I V I L

IN

CIRCUIT COURT

WAYNE COUNTY, MISSISSIPPI

Shelton Hinton

Wayne County, MS Plaintiff
Sheriff Judy Ashby Defendant

Filed this 10th day of August 2020

Docket No. _____ Page No. _____

Daniel M. Waide
Johnson, Ratliff + Waide
Attorney Plaintiff

Attorney Defendant

1 General Docket, Civil Cases, Circuit Court, Wayne County Circuit Court

=====

No. CV-2020-114-C

CFN 5757

HINTON, SHELTON

Counsel for Plaintiff

Vs.

DANIEL M. WAIDE

Counsel for Defendant

WAYNE COUNTY, MS; SHERIFF JODY ASHLEY

JUDGE Charles W. Wright, Jr.

CIVIL RIGHTS

=====

DATE

ORDERS, JUDGMENTS, ETC.

BK/PG

8/10/2020 COVER SHEET

8/10/2020 COMPLAINT

8/10/2020 SUMMONS ISSUED TO JODY ASHLEY

RETURNED TO ATTORNEY FOR PROCESS

8/10/2020 SUMMONS ISSUED TO WAYNE COUNTY, MS

RETURNED TO ATTORNEY FOR PROCESS

IN THE CIRCUIT COURT OF WAYNE COUNTY, MISSISSIPPI

SHELTON HINTON

PLAINTIFF

VERSUS

CAUSE NO: CV-2020-114-C

**WAYNE COUNTY, MISSISSIPPI and
SHERIFF JODY ASHLEY in his individual and
Official capacity**

DEFENDANTS

JURY TRIAL DEMANDED

COMPLAINT

COMES NOW, Shelton Hinton, hereinafter "Hinton," by and through undersigned counsel, and makes this, his Complaint against named Defendants, and would show unto the Court the following, to wit:

PARTIES

1. Plaintiff is a resident citizen of Wayne County, Mississippi who may be contacted through undersigned counsel.
2. Defendant Wayne County is a governmental entity organized and authorized by the laws of the State of Mississippi who may be served with process through its Chancery Clerk at 609 Azalea Drive, Waynesboro, Mississippi, 39367.
3. Defendant, Jody Ashley is sheriff of Wayne County, Mississippi who may be served with process at 613 Court Street, Waynesboro, Mississippi, 39367.

JURISDICTION AND VENUE

4. Venue is proper pursuant to Miss. Code Ann. § 11-11-3 because substantial acts and omissions which caused the injury occurred in Wayne County, Mississippi, and because the action against governmental entities must be commenced in the county where the

entities are located. The misconduct complained of herein arose in Wayne County, Mississippi. Jurisdiction of the parties and of the subject matter of this action are proper in this Court.

5. This action is authorized by 42 U.S.C. § 1983 and made pursuant to the 4th and 14th Amendments to the United States Constitution.

FACTUAL ALLEGATIONS

6. On or about September 20, 2018 Sheriff Ashely signed an affidavit claiming that Shelton Hinton was mentally ill and in need of treatment. These allegations are false and Sheriff Ashley did not personally know Hinton. **Exhibit A, Ashley Affidavit.**
7. Sheriff Ashely swore under oath that he was Hinton's nearest relative to convince a court to have Hinton committed for a mental illness. These allegations are false.
8. As a result of Sheriff Ashley's false affidavit, Hinton was arrested and confined at the Wayne County Jail.
9. At a hearing on the matter Sheriff Ashely admitted that he had no first-hand knowledge regarding any of the facts alleged in his affidavit which led to the arrest and confinement of Hinton.
10. As sheriff, Jody Ashley knows that an affidavit must be based upon personal knowledge.
11. Sheriff Ashley's actions caused the unlawful arrest and confinement of Hinton. The sheriff's actions further resulted in the negligent and intentional infliction of emotional distress on Hinton.

ALLEGATIONS OF LAW

12. Plaintiff incorporates by reference each of the preceding paragraphs as if they had been fully restated herein.

13. All acts of the Defendants were under the color and pretenses of the ordinances, policies, practices, customs, regulations, usages and/or statutes of the United States Government, the State of Mississippi and Wayne County.
14. It is the custom and policy of all Defendants to violate the constitutional rights of individuals in Wayne County, as complained of herein.
15. It is the policy and practice of the Defendants to violate the civil rights of, in and around the area of Waynesboro, Mississippi where the unlawful search and seizure occurred.
16. Defendants' actions were in bad faith and were intended and designed to punish Plaintiff.
17. At all times relevant to this action, Plaintiff's rights were clearly established. At all times relevant to this action, Defendants violated Plaintiff's constitutional rights.
18. Defendant Ashley is a final policy maker for Wayne County, Mississippi.
19. Defendants' actions evidence malice and/or constitute willful misconduct.
20. As a result of Defendants' actions, Plaintiff has suffered humiliation, embarrassment, loss of reputation and had their liberty and privacy interests severely impacted.

FIRST CAUSE OF ACTION – 42 U.S.C. § 1983
Fourteenth Amendment – Unlawful Seizure; Deprivation of Due Process/Equal Protection

21. Plaintiff incorporates by reference each of the preceding paragraphs as if they had been fully restated herein.
22. The unlawful actions of the Defendants, as alleged herein, constituted an intrusion into Plaintiffs' right to be free from an unlawful seizure of his person and property.
23. Defendants had an affirmative duty to prevent such intrusions.
24. Defendants, acting without authority, knowingly conducted an illegal seizure.
25. Plaintiff has an established constitutional right to be free from an unlawful seizure.

26. As a direct and proximate cause of Defendants' actions, Plaintiff's rights, as guaranteed by the Fourteenth Amendment, were injured.

WHEREFORE Plaintiff prays for relief against all Defendants as set forth below.

**SECOND CAUSE OF ACTION – 42 U.S.C. § 1983
DUE PROCESS – 14th AMENDMENT**

27. Plaintiff incorporates by reference each of preceding paragraphs as if they had been fully restated herein.

28. Sheriff Ashley made a knowingly false affidavit for the sole purpose of having Hinton arrested and detained.

29. Sheriff Ashley's actions violated Hinton's rights under the 14th Amendment.

30. Sheriff Ashley caused Hinton to be falsely imprisoned.

WHEREFORE Plaintiff prays for relief against all Defendants as set forth below.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this Court:

1. Assume jurisdiction over this action;
2. Declare that Defendants' actions, as herein described, violated Plaintiff's constitutional rights under the Fourteenth Amendments to the United States Constitution
3. Appropriate equitable relief including but not limited to prospective injunctive relief, declaratory and other injunctive remedies;
4. Award Plaintiff nominal and actual damages for Defendants violation of their constitutional and statutory rights;
5. Award Plaintiff compensatory damages, including, but not limited to, those for past and future pecuniary and non-pecuniary losses, emotional distress, suffering, loss of reputation,

humiliation, inconvenience, mental anguish, loss of enjoyment of life, and other non-pecuniary losses;

6. Punitive damages for all claims allowed by law in an amount to be determined at trial;
7. Pre-judgment and post-judgment interest at the highest lawful rate;
8. Award Plaintiff his costs of litigation, including reasonable attorney's fees and expenses, pursuant to 42 U.S.C. sec. 1988 and/or 20 U.S.C. sec. 1400 et seq.; and
9. Grant such other relief to which Plaintiff may be entitled or as this Court deems necessary and proper.

RESPECTFULLY SUBMITTED this the 8th day of August, 2020.

SHELTON HINTON
PLAINTIFF

DANIEL M. WAIDE, MSB #103543

Daniel M. Waide, (MSB#103543)
Johnson, Ratliff & Waide, PLLC
1300 HARDY ST.
PO Box 17738
HATTIESBURG, MS 39404
601-582-4553 (OFFICE)
601-582-4556 (FAX)
dwaide@jhrllaw.net

IN THE CHANCERY COURT OF WADE COUNTY,
 MISSISSIPPI
 196 JUDICIAL DISTRICT
 IN RE: Shutter Hinton CAUSE NO.

UNIFORM COMMITMENT AFFIDAVIT PURSUANT TO MCA SECTION 41-

COMES NOW Jody Ashley ²¹⁻⁵⁵, relative and/or interested person,
 residing at WC Sheriff Dept., telephone number
735-3801, duly sworn and deposed, says the following to be true and
 correct to the best of my knowledge and belief:

Shutter Hinton is a person I allege to be in need of treatment by
 outpatient or inpatient commitment. Their nearest relative, if known, is
Jody Ashley who resides at WC SO
735-3801, telephone number

I allege the person to be in need of treatment because the
 person is mentally ill under law and poses a likelihood of physical harm to themselves or
 others as demonstrated by (mark as many as may apply) a recent attempt or threat
 to physically harm themselves or others and/or a failure and inability to provide
 necessary food, clothing, shelter, safety, or medical care to themselves as a result of the
 impairment and/or based on treatment history or other relevant evidence, this
 person is in need of treatment to prevent further disability or deterioration which
 will predictably result in dangerousness when their current mental illness limits or
 negates their ability to make an informed decision to seek or comply with recommended
 treatment. To my knowledge the recent behavior described herein is not caused by any
 of the following: epilepsy; intellectual disability; brief periods of intoxication,
 dependence upon or addiction to alcohol or drugs; or senile dementia.

Factual descriptions of recent behavior, witnesses, and where and when it
 occurred, if known:

Paranoid; harassing; potentially
violent

(attach additional pages if needed).

SWORN TO AND SIGNED BY MY HAND this the 20 day of Sept., 2018.
 A.D.

Jody Ashley
 interested person)

AFFIANT (relative and/or

SWORN TO AND SUBSCRIBED BEFORE ME this the 20 day of Sept.
 2018 A.D.

Geary Jackson
 Chancery Clerk
By: Wade M.D.C.

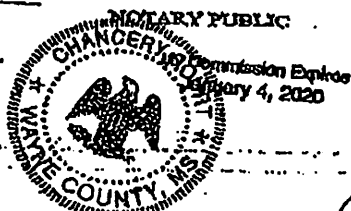


Exhibit A

COVER SHEET Civil Case Filing Form <i>(To be completed by Attorney/Party Prior to Filing of Pleading)</i>		Court Identification Docket Number <div style="border: 1px solid black; padding: 2px; display: inline-block;">171101015</div> County # Judicial Court ID District (CH, CI, CO)		Case Year <div style="border: 1px solid black; padding: 2px; display: inline-block;">2020</div>	Docket Number <div style="border: 1px solid black; padding: 2px; display: inline-block;">171101015</div> Local Docket ID <div style="border: 1px solid black; padding: 2px; display: inline-block;">171101015</div>
Mississippi Supreme Court Administrative Office of Courts		Form AOC/01 (Revised 1/1/2001)		This area to be completed by clerk	
IN THE <u>CIRCUIT</u> COURT OF <u>WAYNE</u> COUNTY					
Short Style of Case: <u>Hinton v. Wayne County, et al</u>					
Party Filing Initial Pleading: Type/Print Name <u>Daniel M. Waide</u> MS Bar No. <u>103543</u>					
Check (✓) if Not an Attorney Check (✓) if Pro Hac Vice Signature _____					
Compensatory Damages Sought: \$ _____ Punitive Damages Sought: \$ _____					
Is Child Support contemplated as an issue in this suit? Yes No If "yes" is checked, please submit a completed Child Support Information Sheet with Final Decree/Judgment					
PLAINTIFF - PARTY(IES) INITIALLY BRINGING SUIT SHOULD BE ENTERED FIRST (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL PLAINTIFFS ON SEPARATE FORM					
Individual <u>Hinton</u> Last Name <u>Shelton</u> First Name (_____) Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV					
Address of Plaintiff _____					
Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____					
Estate of _____					
Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____					
D/B/A / Agency _____					
Business _____					
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated					
Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: _____					
D/B/A: _____					
DEFENDANT - NAME OF DEFENDANT (FIRST NAME IN SHORT STYLE) - ENTER ADDITIONAL DEFENDANTS ON SEPARATE FORM					
Individual _____ Last Name _____ First Name (_____) Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV					
Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____					
Estate of _____					
Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____					
D/B/A / Agency _____					
Business <u>Wayne County, Mississippi</u>					
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated					
Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below: _____					
D/B/A: _____					
ATTORNEY FOR THIS DEFENDANT: _____ Bar No. or Name: _____ Pro Hac Vice (✓) _____					
(If known)					
In left hand column, check one (1) box that best describes the nature of this suit. In right hand column check all boxes which indicate secondary claims.					
Business/Commercial <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Bankruptcy <input type="checkbox"/> Business Dissolution - Corporation <input type="checkbox"/> Business Dissolution - Partnership <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Examination of Debtor <input type="checkbox"/> Execution <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Pension <input type="checkbox"/> Receivership <input type="checkbox"/> Replevin <input type="checkbox"/> Stockholder Suit <input type="checkbox"/> Other _____		Probate <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Monument of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Power of Attorney <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Other _____		Children and Minors - Non-Domestic <input type="checkbox"/> Adoption - Noncontested <input type="checkbox"/> Consent to Abortion for Minor <input type="checkbox"/> Removal of Minority <input type="checkbox"/> Other _____	
Domestic Relations <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Differences <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> UIFSA (formerly URESA) <input type="checkbox"/> Other _____		Statutes/Rules <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> ERISA <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Extraordinary Writ <input type="checkbox"/> Federal Statutes <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Municipal Annexation <input type="checkbox"/> Racketeering (RICO) <input type="checkbox"/> Railroad <input type="checkbox"/> Seaman <input type="checkbox"/> Other _____		Torts - Personal Injury <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Products Liability <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____	
Contract <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Product Liability under Contract <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____		Appeals <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Employment Security Comm'n <input type="checkbox"/> Municipal Court <input type="checkbox"/> Oil & Gas Board <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other _____		Mass Tort <input type="checkbox"/> Asbestos <input type="checkbox"/> Chemical Spill <input type="checkbox"/> Dioxin <input type="checkbox"/> Hand/Arm Vibration <input type="checkbox"/> Hearing Loss <input type="checkbox"/> Radioactive Materials <input type="checkbox"/> Other _____	
				Real Property <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Receiver Appointment <input type="checkbox"/> Tax Sale: Confirmation/Cancellation <input type="checkbox"/> Title, Boundary &/or Easement <input type="checkbox"/> Other _____	
				Civil Rights <input type="checkbox"/> Elections <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief <input type="checkbox"/> Prisoner <input checked="" type="checkbox"/> Other <u>1063</u>	

IN THE CIRCUIT COURT OF WAYNE COUNTY, MISSISSIPPI
JUDICIAL DISTRICT, CITY OF

Docket No. _____ - _____
File Yr Chronological No Clerk's Local ID

Docket No. If Filed
 Prior to 1/1/94 _____

**DEFENDANTS IN REFERENCED CAUSE - Page 1 of ____ Defendants Pages
 IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

Defendant #2:

Individual: Ashley Jody (_____) _____
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

Defendant #3:

Individual: _____ (_____) _____
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

Defendant #4:

Individual: _____ (_____) _____
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

____ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A _____

Business _____
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice (✓) ____ Not an Attorney(✓) ____

IN THE CIRCUIT COURT OF WAYNE COUNTY, MISSISSIPPI

SHELTON HINTON

PLAINTIFF

V.

CIVIL ACTION NO.: CV-2020-114-C

WAYNE COUNTY, MISSISSIPPI and
SHERIFF JODY ASHLEY in his individual
and official capacity

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI
COUNTY OF WAYNE

TO: Jody Ashley
613 Court Street
Waynesboro, MS 39367

THE COMPLAINT, WHICH IS ATTACHED TO THIS SUMMONS, IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand deliver a copy of a written response to the Complaint to Daniel M. Waide, P.O. Box 17738, Hattiesburg, MS 39404, attorney for the Plaintiffs. Your response to the Complaint must be mailed or delivered within 30 days from the date of delivery of this Summons and Complaint or a judgment by default will be entered against you for the money or other things demanded in the Complaint. You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

Issued under my hand and seal of said Court, this 10th day of August, 2020.

Rose M. Bingham,
WAYNE COUNTY CIRCUIT CLERK

By Kathryn Revett D.C.

Daniel M. Waide, (MSB#103543)
1300 HARDY ST.
PO Box 17738
HATTIESBURG, MS 39404
601-582-4553 (OFFICE)
601-582-4556 (FAX)
dwaide@jhrllaw.net



IN THE CIRCUIT COURT OF WAYNE COUNTY, MISSISSIPPI

SHELTON HINTON

PLAINTIFF

V.

CIVIL ACTION NO.: CN-2020-114-C

WAYNE COUNTY, MISSISSIPPI and
SHERIFF JODY ASHLEY in his individual
and official capacity

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI
COUNTY OF WAYNE

TO: Wayne County, Mississippi
609 Azalea Drive
Waynesboro, MS 39367

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Rose M. Bingham,
WAYNE COUNTY CIRCUIT CLERK

By Kathryn Revett D.C.

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dwaide@jhrllaw.net



JOHNSON, RATLIFF & WAIDE, PLLC

Attorneys at Law
Second Floor
Great Southern National Bank Building
1300 Hardy Street
Hattiesburg, MS 39401

Telephone: (601) 582-4553
Telefax: (601) 582-4556
E-Mail: dwaide@jhrlaw.net
brichards@jhrlaw.net

S. Joel Johnson
Michael V. Ratliff
Daniel M. Waide

P. O. Box 17738
Hattiesburg, MS 39404-7738

August 7, 2020

Rose M. Bingham
Wayne County Circuit Clerk
609 Azalea Drive
Waynesboro, MS 39367

RE: *Shelton Hinton v. Wayne County, et al*

Dear Ms. Bingham,


Please find enclosed for filing herein, the following documents:

- *Civil Cover Sheet;*
- *Complaint for Shelton Hinton v. Wayne County, et al and One Copy;*
- *Wayne County Summons;*
- *Jody Ashley Summons; and*
- *Check No. 1441 in the amount of \$160.00 for the filing fee*

Please file the original in your customary manner and return the file stamped copy to me, along with the issued summons, in the self-addressed, stamped envelope enclosed herein.

With kindest regards, I am

Sincerely,


Brittany Richards
Paralegal to Daniel M. Waide, Esq.

encl.